

Exhibit A

Declaration of

Ryan Witt

### **DECLARATION OF RYAN WITT**

I, Ryan Witt, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am the Freedom of Information Act (“FOIA”) Officer for the Bureau of Land Management’s (“BLM”) Headquarters Office (HQ Office). In this capacity, my job duties involve responding to Freedom of Information Act (“FOIA”) requests.
2. As the FOIA Officer for the BLM’s HQ Office, I am responsible for overseeing the BLM’s National FOIA Office. In this role, I supervise the BLM’s FOIA specialists and coordinators.
3. I make the following statements based on my personal knowledge and information made available to me in my official capacity.
4. The BLM received a FOIA request from Wild Horse Education (“Plaintiff”) on October 7, 2019. The request sought “Any and all correspondence, meeting notes, telephone records, operation evaluation sheets, pertaining to [] the evaluation, training, proposed changes, effectiveness of the Comprehensive Animal Welfare Policy (CAWP).” Complaint, ¶¶ 26, 28 and Exhibit A thereto.
5. After conducting an adequate search for responsive records, the BLM provided a full and final response to Plaintiff’s FOIA request on April 9, 2025 . The BLM produced 307 pages, with 103 pages withheld in full or in part under Exemption 5 of the FOIA.
6. The BLM’s search for records in response to Plaintiff’s FOIA request was reasonably calculated to uncover all responsive records, and all files reasonably expected to contain responsive records were searched. In addition, all non-exempt responsive records have been released to Plaintiff.

7. To date, Plaintiff has not indicated any concerns regarding the BLM's production.

Executed on this 11th day of June 2025.

/s/ Ryan Witt\_\_\_\_\_

Ryan Witt  
FOIA Officer  
Bureau of Land Management,  
United States Department of the Interior